



March 30, 2005

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seaworld.com

Mr. John H. Robertus
San Diego Regional Water Quality Control Board
9174 Sky Park Court, Suite 100
San Diego, California 92123-4340

RE: IC: 12-0083.01
Renewal of Water Discharge Requirements for Sea World San Diego
Comments on Tentative Order No. R9-2005-0091

2005 MAR 30 P 1:04

WATER QUALITY
CONTROL BOARD

Dear Mr. Robertus,

Sea World San Diego has reviewed Tentative Order No. R9-2005-0091 and is offering the following comments for the Board's consideration:

1. Section II B of the Waste Discharge Requirements (page 3 of 21) contains references to sodium bisulfate and sodium sulfate being used by the Park to neutralize residual chlorine in its discharge. These references should be changed to sodium bisulfite and sodium sulfite, respectively.
2. Section VII B 3 (a)(i) of Attachment F, Section III C and Section XI, 3 (a)(i) of the Waste Discharge Requirements (pages 7 of 21 & 17 of 21, respectively) all prohibit draining of aquaria and pools during storm events. Sea World believes that the intent of this prohibition is to eliminate the discharge of pool or aquaria water during by-pass events caused by excessive rainfall. Sea World believes that aquaria and pool draining should be allowed during storm events as long as the combined flow can be processed through the on-site treatment systems. Sea World suggests the following revised language for these sections of the WDR: "Aquaria and pool draining activities are allowed during a storm event as long as the combined flows from the storm event and the effluent from the facility is processed through the water treatment system and does not create a by-pass condition."
3. Section IV of the Waste Discharge Requirements, Table 6 & 7 contain limits for suspended solids that limit the Park's East & West discharge to "...no increase of 10 mg/l for a monthly average or 15 mg/l for a daily maximum in the concentration of total suspended solids when compared to the intake water." Sea World would like an explanation of the basis of this limit.



4. Attachment D – Federal Standard Provisions, Section I, A, part 7, entitled “Bypass (page D-2 of 11)”. Paragraph “b” is potentially confusing; Sea World suggests moving this paragraph to the end of part 7 and entitling it “Exemptions from Bypass Provisions”.
5. Attachment E – Monitoring and Reporting Program, Section V, part B (page E-6 of 14) details the requirements for measuring Chronic Toxicity in Sea World’s effluent. Table 4 lists approved tests for chronic toxicity including a list of species. Sea World suggests including language in this part, similar to the language found in the previous permit, which limits this testing to three species.

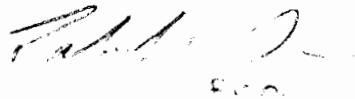
Suggested language – “A minimum of three test species with approved test protocols shall be used to measure compliance with the chronic toxicity objective. The test species shall include a fish, an invertebrate and an aquatic plant. After initial screening, monitoring may be reduced to the most sensitive species. Dilution and control water should be obtained from an unaffected area of the receiving waters or from another saltwater source such as filtered seawater from Scripps Institute of Oceanography. The sensitivity of the test organisms to a reference toxicant shall be determined concurrently with each bioassay test and reported with the test results. “

6. Attachment E – Monitoring and Reporting Program, Section IX, part A, paragraph 2 (page E-8 of 14) requires that “A monitoring station be established 50 feet from the outfall”. Sea World suggests changing the word “station” to “location”.
7. Attachment E – Monitoring and Reporting Program, Section IX, part C; entitled “Special Studies” (page E-9 of 14) requires Sea World to implement special studies as directed by the Board. Sea World finds this provision vague and suggests including the additional explanatory language found in Section XI, 2(a) (page 17 of 21) of the Waste Discharge Requirements and in Section VII, B, 2(a) (page F-35 of 39) of the Fact Sheet. This addition will make the Monitoring and Reporting Program consistent with both the Waste Discharge Requirements and the Fact Sheet.

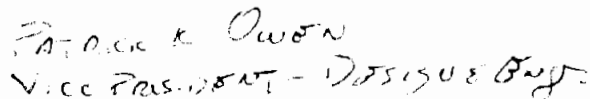
If you have any questions regarding this matter please contact Mr. Kevin Carr at (619) 226-3934.

Respectfully,

SEAWORLD SAN DIEGO



Andrew P. Fichthorn
Executive Vice President and General Manager



Andrew K. Owen
Vice President - Discharge Dept.